

June 14, 2023

**VIA CM/ECF**

Honorable Jennifer L. Rochon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Trireme Energy Holdings, Inc. et al. v. Innogy Renewables US LLC et al.*,  
No. 1:20-cv-05015-JLR-BCM [rel. 1:22-cv-07439-JLR]**

Dear Judge Rochon:

The parties in the above-captioned matter jointly write to respectfully request a one-week extension to the deadline for Defendants to advise the Court of their intentions regarding a summary judgment motion (*see* ECF No. 198). This is the first such request as to this deadline.

Since the recent conference on June 8, 2023, the parties have discussed whether there is a path to potentially narrow the issues and claims remaining in the case. If the parties can reach definitive agreement, it may eliminate the need for summary judgment motion practice.

The parties, however, require additional time to continue their negotiations and for counsel to discuss this potential agreement with their clients. Accordingly, the parties request that the deadline for Defendants to advise the Court whether they intend to make a summary judgment motion be extended by one week, from June 15, 2023 until June 22, 2023.

Respectfully submitted,

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The request is GRANTED. Defendants shall  
file the above described letter by **June 22,  
2023**.

Dated: June 14, 2023 SO ORDERED.  
New York, New York

  
JENNIFER L. ROCHON  
United States District Judge

*Counsel for Defendants*